

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SONYA LARSON,

Plaintiff

v.

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

Defendants

C.A. No. 1:19-cv-10203-IT

**REQUEST FOR ORAL
ARGUMENT**

DAWN DORLAND PERRY,

Plaintiff-in-Counterclaim

v.

SONYA LARSON,

Defendant-in-Counterclaim

**DAWN DORLAND PERRY'S
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rules 7.1 and 56.1, now comes Defendant/Plaintiff-in-Counterclaim Dawn Dorland Perry (“Ms. Dorland”) who respectfully moves this Court to grant Summary Judgment in her favor with respect to Counts I, II, and III asserted in her Counterclaim (Doc. No. 96), as well as Counts I, II, VII, and VIII asserted in the Second Amended Complaint by Plaintiff/Defendant-in-Counterclaim Sonya Larson (Doc. No. 91) because there are no disputed issues of material fact and she is entitled to judgment as a matter of law. In support of this Motion, Ms. Dorland submits the accompanying Affidavit of Hannah Y. Amadei, Statement of Undisputed Material Facts, filed

contemporaneously herewith, and the Memorandum of Law in Support of the Motion for Summary Judgment.

Pursuant to Local Rule 7.1(d), Ms. Dorland believe that oral argument may assist the Court and wishes to be heard.

Pursuant to Local Rule 7.1(a)(2), counsel certifies that they have conferred and have attempted in good faith to resolve or narrow the issues in this matter.

WHEREAS, Ms. Dorland respectfully requests as follows:

- (a) The Court enter Judgment in her favor on all Counts brought against her in the Second Amended Complaint;
- (b) the Court enter Judgment in her favor on Counts I-III, as to liability, of Ms. Dorland's Counterclaim;
- (c) Any other relief the Court finds fair and reasonable.

Respectfully submitted,

Dawn Dorland Perry

By Her Attorneys,

PARTRIDGE SNOW & HAHN LLP

/s/Suzanne M. Elovecky

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DATED: October 28, 2022

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of October 2022, this document was filed and served through the ECF system and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Suzanne M. Elovecky

Suzanne M. Elovecky (BBO #670047)

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